

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA,	:	
Plaintiff	:	
	:	
V.	:	Case Number: 1:20-mj-00034-LDA
	:	
David Adler Staveley	:	
Defendant	:	

**MOTION TO ENLARGE THE TIME FOR PRELIMINARY
HEARING AND REVIEW OF PRELIMINARY HOME
DETENTION AND ELECTRONIC MONITORING ORDER**

NOW comes the Defendant, David Adler Staveley, and moves that the court enter an order extending the time for the Preliminary Hearing and Preliminary Home Detention and Electronic Monitoring Order for an additional week beyond the scheduled hearing on May 26, 2020, subject to the Court's calendar. The Defendant is in the process of retaining private counsel and requires additional time to prepare for the hearings remotely with counsel once retained. Defendant anticipates that process to be resolved by the end of the week, with counsel entering on Tuesday, May 26, 2020, following the Memorial Day holiday.

Defendant avers that the interest of justice would be served by allowing additional time for the preliminary hearing. All orders previously entered are requested to remain in effect. Currently, an additional week is requested. Such continuance should therefore be excludable for speedy trial calculation. As a consequence of the foregoing request Counsel necessarily moves to vacate the hearing date for the preliminary hearing.

Respectfully submitted,
Defendant David Adler Staveley
By his attorney,

/s/ George J. West
George J. West, Esq. #3052
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Dated: May 20, 2020

CERTIFICATION

I, the undersigned, do hereby certify that on the 20th day of May, 2020, I caused the within Defendant's Motion for Extension of Time to be filed on the ECF System and thereby served via the same upon Lee Vilker, Esq., Assistant U.S. Attorney.

/s/ George J. West